

IN THE UNITED STATES DISTRICT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                  )  
Plaintiff,                    )  
                                  )  
vs.                            )                           Case No. 4:13CR222 JAR  
                                  )  
THOMAS ZELL,                )  
                                  )  
Defendant.                    )

DEFENDANT'S OBJECTIONS REGARDING  
PRESENTENCE INVESTIGATION REPORT

Comes now Defendant Thomas Zell, by and through counsel Paul J. D'Agrosa and hereby files the following objections to the presentence investigation report.

**VICTIM IMPACT**

20-22. The defendant intends to object to any request for restitution, made by the government on behalf of the identifiable victims.

WHEREFORE, the defendant requests this Court sustain his objection.

Respectfully submitted,

LAW OFFICES OF  
WOLFF & D'AGROSA

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CERTIFICATE OF SERVICE

I hereby certify that on this 3<sup>rd</sup> day of January, 2014 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following: Miss Erin Granger, Assistant U.S. Attorney.

/s/ Paul J. D'Agrosa